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**IN UNITED STATES DISTRICT COURT
NORTHERN DISTRICT
OF ILLINOIS
EASTERN DIVISION**

JUL 08 2024 JB

**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**

PARIS MARTIN

**24cv5694
Judge Harjani
Magistrate Judge Finnegan
Randomly Assigned CAT 2**

VS

**WENDELL PHILLIPS ACADEMY HIGH SCHOOL
CHICAGO PUBLIC SYSTEM in its individual capacity official capacity ; ATHLETIC
DIRECTOR JAMES DANIELS IV individual capacity and official capacity; ; PRINCIPAL
TALLEY in her individual capacity and official capacity ; SHALANDA MACKEY individual
capacity and official capacity ; LARRY STOKES individual capacity and official capability.**

CIVILNO:

**42 U.S.C. Ss 1983 / 42 U.S.C. Ss 1985 & 1986 negligence to stop a conspiracy /
DUE PROCESS VIOLATION & EQUAL PROTECTION VIOLATION 42 U.S.C. Ss 1981
harassment/ DENIAL OF HOMEST GOVERNMENT SERVICES .**

**NOW COMES PARIS MARTIN in his own proper persona sui juris and moves this
honorable court and set forth his claims under 42 U. S. C. Ss 1983 for violation of Honest
government service and for denying the plaintiff compensation form the Chicago public
schools system .**

JURISDICTION

Jurisdiction is invested in this court pursuant to 28 U.S.C. Ss 1331 & 28 U.S.C. Ss1334

VENUE

VENUE is invested in this court pursuant to 28 U.S.C. Ss 1391

PLAINTIFFS

PARIS MARTIN

4151 192Nd court
Country club Hills II 60478

DEFENDANTS

Wendell Phillips Academy High school
244 E. PERSHING RD
CHICAGO IL 60653

CHICAGO PUBLIC SYSTEM
42 W. Madison st
Chicago IL 60602

ATHLETIC DIRECTOR JAMES DANIEL
42 W. Madison st
Chicago IL 60602

PRINCIPAL TALLEY
42 W. MADISON ST
CHICAGO IL 60602

SHALANDA MACKEY
42 W. Madison st
Chicago IL 60602

STATEMENT OF FACTS

On summer of 2022 the Head Coach at Phillips High School the plaintiff experienced discrimination and harassment .

The harassment and discrimination has continued through 2022 , 2023 & 2024 , The Plaintiff states at the start of the school year , plaintiff engaged in several conversations with the Athletic Director James Daniels IV regarding the budget for uniforms , shoes , and travel expense .

The plaintiff was assured that orders for new uniforms and team shoes were placed .

However, these items were never received at the beginning of the season.

AS a result, we were forced to wear last year's uniforms .

My coaching staff and plaintiff had to personally purchase team shoes , uniforms, shooting shirts, and food for players on road trips.

The lack of proper gear meant our team looked unprofessional compared to other CPS basketball programs , especially during downstate tournaments.

Despite multiple discussions about the budget , plaintiff was informed that there were no funds available.

Forcing us to cover all accommodations out of my own pockets added up to thousands .

In addition to me finding out there was no budget , the plaintiff had to reapply for the head coach position right before the state tournament which was held in February.

Having to complete all CPS background requirements again to be cleared which consists of undergoing another round of TB test , and fingerprinting , only to be informed by Human Resources that my application was halted at the fingerprint stage.

At the end of the season , we spoke regarding my stipend and the refund for all the purchased items such as food , travel expenses and gear . Per the Athletic Director James Daniel IV the plaintiff was told with receipts CPS does not back pay , nor do they refund out of pocket expenses to coaches .

That pushed me in a financial hardship causing me a mental breakdown .

I Suffered and still suffering from a mental state of depression .

Being mentally strained caused me to need professional treatment (therapy)

(SCHOOL YEARS 2023 -2024)

The plaintiff states on August 28 ,2023 : all the above parties had a meeting with Heritage Representatives Julian Williams about uniforms cost and budget.

The plaintiff was informed that we had a \$25,000 budget that was supposed to be used for boys and girls ' basketball.

During the meeting with the heritage representative , Julian Williams , the Athletic Director Mr . Daniels , principal Talley , shalanda Mackey - school Treasure Larry Stokes -Girls Basketball Coach , and the plaintiff were in attendance.

In conclusion of the meeting both parties agreed we would go with the Heritage sports package for 2023/24 season.

The Heritage package included 3 sets of uniforms, 2 walk around shoes , jumpsuits 2 pairs of team shoes , bookbags , and winter jackets . As follows: we had a fall league that was suppose to help pay Heritage for the package.

Heritage Rep Julian Williamson stated that we were short in our package due to the monies being misappropriated for the boy's program and not fully paid .

We did not received our third uniform, winter jackets , second walk around shoes , or second jumpsuit . All this was prior to the season starting.

NOVEMBER 23, 2023 QUINCY THANKING SHOOTOUT .

Prior to leaving for the tournament on November 17, 2023 , we had meetings with my coaching staff , myself and the AD. Mr. Daniels discussing travel arrangements, lodging and food , per the AD, Ms. Renell Perry was supposed to cater food for the entire team during Thanksgiving Day .

With less than 24 hours ' notice the AD James Daniels IV changed the time of pick up and departure from Wednesday at 1:30 pm to Thursday (thanksgiving Morning) at 7 am Not to mention, Renell Perry will not be available to cater dinner for the players , coaches and parents.

Due to short notice from the AD James Daniels IV , the plaintiff had to have my mothers prepare a full thanksgiving dinner in less than 24 hours .

CONTINUED DISCRIMINATION AND HARASSMENT

DECEMBER 10, 2023 : POST - GAME MEETING CRITIQUE

After a loss to curie , the Athletic Dictators (AD) harshly criticized the coaching staff , labeling the game an " embarrassment ". Despite being early in the season , the AD dismissed our efforts and demoralized the team and staff .

Claiming that the parents were unhappy in the direction that the program was going after two losses in conference. The plaintiff assured him it was too early in the season to be jumping into conclusion.

DECEMBER 12 , 2023 : INTERACTION WITH PLAYERS / PARENTS

During the Kenwood HS game , the AD James Daniels IV and Kimberly Addison , who is a parent, were there to assess my coaching . After the game , we had a locker room

discussion, we addressed the team's performance and announced potential changes in the lineup .

This led to complaints from a player's parent, which the AD used As a pretext to threaten me with a suspension.

AD JAMES DANIELS IV also accused the plaintiff of allowing an associate of mine to coach the teams from the stands .

The associate was only sitting behind the bench yelling and streaming as everyone else in the building was doing .

This witness and associate of the plaintiff's was there to support the kids that played for him in youth basketball which had nothing to do with the plaintiff and AD continued to harass the plaintiff and discriminate against the plaintiff making sure the plaintiff would succeed as receiving just compensation for his work ethics.

DECEMBER 14-15,2023 : AD HARASSMENT AND DISCRIMINATION CONTINUE.

Tuesday , December 14, Mr Daniels the AD called me to put me on suspension for two games (Hyde park ranks 24th in the state of Illinois and Lincoln Park was ranked 13th in the state) Three hours before game time which was 2pm . Despite a subsequent meeting with AD James Daniel's IV , principal Tally and Terrance Young, all parties were part of the scheme and artifice
Which concluded without a suspension.

The Defendant AD behavior remained hostile and unprofessional and calls into question several factors (1) he was without funds for the plaintiff (2) he became upset when I requested pay (3) I had access to all material afforded to the head coach and staff member at the High school.

After the win over Hyde Park High school , the AD lack of communication and support for the program shows contempt.

AD didn't show the support a head coach is supposed to show and he failed to acknowledge coaching staff and the players after the win against Hyde Park high school.

SATURDAY, DECEMBER 16, 2023

The plaintiff and team took a loss to McHenry High School, again the AD Daniel with an aggressive stance and demeanor on the subject matter of the " program " , players and coaching staff .

The behavior of the AD Daniels shows his lack of professionalism and the poor job this individual was doing as head coach .

Come to find out the coach of the Lincoln Park “ JOSH ANDERSON “ was AD best friend.

MONDAY , DECEMBER 18, 2023

Plaintiff received a text message in the coaches ‘ chat stating that the AD schedule a mandatory meeting with the coaches and myself at 4pm . 11/2 before game time .

AD was making comments that he is tired of the professionalism with the program.

Informed me to trust my coaches more and stop worrying about the player’s stats and concentrate on the winning games .

Plaintiff should not question our stat lady during games . That “ he had it up to here after the loss to McHenry High school on Saturday “ .

Plaintiff will never win in high school at this level because of poor preparation of the game films . So , plaintiff stated if you and Alicia Miller (stat lady) will allow me to run my program we will do great .

The plaintiff states AD Daniels started disrespecting the plaintiff but not allowing the plaintiff to run the program.

The CPS need to adopt a program or a check and balance system with basketball, football, and other sport to insure the youth are getting the correct education and training.

Plaintiff states there are too many voices outside of the plaintiffs being heard from outside sources within and outside the program.

AD Daniels responds as you are not that great of a coach , and you were never my pick .

You were principal Tally’s pick plus I don’t know you ; My pick was Josh Anderson (Head coach at Lincoln park for the job .

This shows more contempt and unprofessional because the whole Time the plaintiff has been doing his job and this AD has been violating the integrity and professionalism of the plaintiff and the morals and values of the players .

After praying in the office before leading the players to victory through all the harassment coming from the plaintiffs' way because I am a black man seeking to educate the youth and keep players off the streets .

The plaintiff states mental anguish is a major factor because after the harassment and discrimination plaintiff started to lose weight and it started to weigh really heavily on plaintiff that AD was trying his best to get him kicked off the coaching staff .

PLAINTIFFS while dealing with the school administrators and administration plaintiff realized these young boys and girls were in negative, toxic environments and plaintiff himself was being subject to discrimination and harassment.

The plaintiff states has a professional and a mentor. I do what is best for the organization and players .

DECEMBER 19 , 2023 UNDERSTANDING AUTHORITIES WERE THE HARASSMENT CONTINUES AND THE DISCRIMINATION.

James Daniel's IV (AD) held meetings with parents and players without involving the plaintiff nor the other coaching staff, directly undermining plaintiff Authority and establishing team protocols.

Plaintiff states AD conduct was so unprofessional and unacceptable and was never addressed by the administrators or administration .

The unprofessional behavior was so disgusting that AD Daniel's went so far to say and I quote (he gathered all the players together and asked if coach Paris Martin wasn't part of the coaching staff no more would players leave to school and program) . This was the eye opener and should have been addressed .

After hearing this plaintiff called his therapist with concern because my mental health was starting to decline and Anxiety was a factor .

MORE BUDGET AND RESOURCES ISSUES BECAUSE CPS WASN'T INVESTING IN THEIR URBAN CURRICULUM SUCH AS BASEBALL, BASKETBALL BALL , FOOTBALL PROGRAM.

Plaintiff states throughout the seasons , plaintiff was faced with numerous issues related to budget and resources. Despite promises, the program did not receive new uniforms, shoes , or other essential items need .

The plaintiff had to pay out his pocket and was never compensated for his financial expenses.

UNPAID COMPENSATION

DESPITE ASSURANCE, plaintiff was not compensated for his work due to the administration delays and lack of care for the school programs.

The compensation issues show the defendants stealing from the program all the way down to paying the coaching staff and using the staff personnel finances to aid at-risk youth .

The AD Daniel's listed himself has the head coach and was receiving compensation for my stipen and had someone else listed to receive my stipend for previous years .

**THE UNPROFESSIONALISM
AND LACK OF ETHICAL TREATMENT LEAD TO MY MENTAL HEALTH BEING IMPACTED**

The Constant harassment, and disrespect and belittling from James Daniels IV is a serious issue.

The plaintiff has formed a case of Anxiety and depression to the point I been getting advice from my therapist.

And the work environment is toxic and their a lack of communication skills and professional at this CPS school .

The plaintiff states he lead the school to the Illinois state championship and the school won for the state of Illinois.

The plaintiff has been on different sport Chanel's and interviews by different platforms and has made a difference in these urban youth life .

Just to be talk down on by James Daniel's IV and all the parties named in this lawsuit turned a blind eye to Mr Daniels conduct after plaintiff continued to address these issues through grievances orally because their no proper chain of command to address these issues .

The CPS school system is taking the money from the sports program and misappropriating those funds and when the plaintiff address these issues he is the bad guy , but the plaintiff hasn't been compensated in 2 years by CPS .

The plaintiff states the CPS was acting under the color of state law and this court has jurisdiction pursuant to 28 U.S. C. Ss 1343 & 28 U.S.C. Ss 1331 and the court has supplemental jurisdiction Over all state court claim because this violation happens under the United States constitution 14th amendment.

RELIEF SOUGHT

1. Plaintiff is seeking compensatory damages in the amount this court deems just and fair
2. Plaintiff is seeking punitive damages in the amount this court deems just and fair .
3. The plaintiff is seeking 1 million dollars for mental anguish, Anxiety and Depression due to the harassment and discrimination he suffered at the hand of CPS .
4. Plaintiff is seeking counsel under the trial bar obligation.
5. Seeking An injunction against CPS to bring the programs up to constitutional standards so that the urban youth and succeed in curriculum development.
6. Declaratory relief

A handwritten signature in blue ink, appearing to read "Paris Martin", is written above the typed name.

RESPECTFULLY SUBMITTED
PARIS MARTIN

7-5-24